

Interrogatories of TransCanada Power Transmission

Application Summary, pp. 1-2

The evidence states that the technical expertise of the applicant's affiliates, Hydro One Networks Inc. ("HONI") and Brookfield Asset Management ("Brookfield") (collectively the "Utilities") "provides the Applicant with a very high level of technical capability, expertise and experience with respect to the activities that are associated with the Application."

Interrogatories:

For the purposes of these interrogatories, any reference to the East-West tie project should be interpreted as including all projects that are predecessors to the East-West tie project and, specifically, also include all projects that at any time addressed the potential expansion of the capacity of the East West tie.

1. Please advise when one or both of the Utilities first considered developing the East-West Tie.
2. Please advise of all the resources invested by each of the Utilities in their consideration of the East-West tie on an annual basis, starting with the time that one or both of the Utilities first considered developing the East-West Tie. Resources include direct costs such as consultant and other third party costs as well as indirect costs, such as staff time.
3. Please provide copies of all materials in the Utilities' possession respecting the development of the East-West Tie that was prepared or collected prior to the formation of EWT.
4. Please provide copies of all agreements between the Utilities, and any of the Applicant, BLP and Participating First Nations respecting the technical, financial, and other support that the Utilities are making available to the Applicant.
5. Please provide copies of all notes, memoranda, and correspondence, including correspondence with the government and public agencies, including the OEB, the IESO and the OPA (including e-mails and transcriptions of voice mail messages) which relates to the East-West tie project, including the support that the Utilities will grant to the Applicant, BLP and the Participating First Nations for that project.
6. Please provide an accounting of all costs expended by the Utilities for studies, analysis, stake-holding, etc. on the East-West tie project. The determination of costs should indicate how the overhead costs of the Utilities are allocated to the East-West tie project.
7. Please identify the personnel and consulting staff of the Utilities that have been involved in the East-West Tie project and how much time and other resources were invested in that involvement.
8. Please provide copies of all materials, including cost allocation studies and any other materials which address how the Applicant has and will compensate the Utilities for the support that they have provided and will provide to the East-West tie project.

9. Please provide copies of all materials, including cost allocation studies and any other materials which address how the Utilities determine which costs were included in their deferral accounts respecting the East-West tie project.
10. In responding to this information, please differentiate all costs that were incurred by the Utilities both prior and subsequent to the opening of deferral accounts respecting the East-West tie project.
11. Please provide copies of all materials that the Utilities have provided to the Applicant, BLP and Participating First Nations respecting the East-West tie project.
12. The evidence states that BLP "has a high level of experience and expertise with respect to the geographic area and environmental attributes". Please provide all agreements between and correspondence among the Utilities, BLP and the Participating First Nations.
13. Please advise of any compensation and other consideration that the Utilities have provided to BLP and the Participating First Nations.
14. Section 9 (a) of the Licence Application form indicates that a number activities will be contracted out.
 - a. With respect to Design and Construction, the application form states that the Applicant's "current intention" is to contract with a third party through a procurement process.
 - i. Please advise whether the Utilities will be eligible to participate in the procurement process.
 - ii. Please confirm that EWT will advise the Board and the parties if its current intention changes.
 - b. With respect to Operation, the application form states that the Applicant's current intention is to contract system operations to HONI.
 - i. Please provide a copy of any arrangement with HONI respecting system operations, including an operations agreement and any other document.
 - ii. Please request HONI to confirm that it will provide operation services to any party that is designated to develop this line on the same terms as it would provide to the Applicant.
 - c. Please advise whether either of the Utilities have been or will be involved in preparing regulatory materials for the designation application and, if so, to provide specifics of their involvement.
15. Section 10 of the application provides information about each key individual that has been redacted. Please confirm whether the Board has ordered that this information be kept confidential and, if the Board has not so ordered, please provide an unredacted version of the application that includes this information.

16. The evidence includes financial statements of the Utilities. Please provide financial statements of BLP and Participating First Nations.